

Challenor Finance CC

Protection of Personal Information Policy

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Introduction

This Protection of Personal Information Policy outlines the commitment of Challenor Finance CC ("the Company") to protect the personal information of individuals in accordance with the provisions of Act 4 of 2013 ("the Act"). The Act aims to regulate the processing of personal information by public and private bodies and to provide guidance on the responsible use of personal information.

Scope

This policy applies to all employees, contractors, and third-party service providers who have access to personal information during the course of their duties at the Company. It covers all forms of personal information, including but not limited to, names, contact details, identification numbers, financial information, and any other information that can be used to identify an individual.

Principles

1. Lawfulness, fairness, and transparency: The Company shall process personal information lawfully, fairly, and in a transparent manner.
2. Purpose limitation: Personal information shall be collected for specified, explicit, and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
3. Data minimization: The Company shall only collect personal information that is adequate, relevant, and limited to what is necessary for the purposes for which it is processed.
4. Accuracy: The Company shall take reasonable steps to ensure that personal information is accurate, complete, and up-to-date.
5. Storage limitation: Personal information shall be kept in a form that permits identification of data subjects for no longer than is necessary for the purposes for which the personal information is processed.
6. Integrity and confidentiality: The Company shall process personal information in a manner that ensures appropriate security, including protection against unauthorized or unlawful processing and against accidental loss, destruction, or damage.

Responsibilities

Data Protection Officer (DPO): The Company shall appoint a Data Protection Officer responsible for overseeing compliance with the Act and this policy. The DPO shall act as the point of contact for data subjects and supervisory authorities.

Employees: All employees are responsible for ensuring the protection of personal information in their possession and must adhere to this policy and related procedures.

Third-party service providers: The Company shall only engage third-party service providers who can provide sufficient guarantees to implement appropriate technical and organizational measures to meet the requirements of the Act and this policy.

Data Subject Rights

Data subjects have the following rights regarding their personal information:

1. Right to be informed
2. Right of access
3. Right to rectification
4. Right to erasure
5. Right to restrict processing
6. Right to data portability
7. Right to object
8. Rights related to automated decision making and profiling

Data Breach Management

In the event of a data breach involving personal information, the Company shall:

Immediately take steps to contain the breach and mitigate its effects.

Notify the relevant supervisory authority and affected data subjects, where required by law.

Conduct a thorough investigation into the cause of the breach and take steps to prevent recurrence.

Training and Awareness

The Company shall provide regular training and awareness programs to employees on their responsibilities under the Act and this policy. Employees shall receive training on handling personal information securely and reporting any potential breaches.

Policy Review

This policy shall be reviewed annually or more frequently as required by changes in legislation or the Company's operations.

Conclusion

The Company is committed to protecting the personal information of individuals and complying with the requirements of the Act. This policy serves as a framework for the responsible and lawful processing of personal information and the protection of data subjects' rights. Compliance with this policy is mandatory for all employees, contractors, and third-party service providers.

Policy Approval

This policy has been approved and endorsed by Seema Reddy -Data Protection Officer on 1 June 2024.

A handwritten signature in black ink that reads "Reddy". The signature is written in a cursive style with a large, looped 'R' and a trailing flourish.

[Signature]